

UNITED STATES OF AMERICA
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)
)
)
V.) No. 09-Cr-30-02-GZS
)
)
ELAINE BROWN))
)

UNOPPOSED MOTION TO UNSEAL OFFER OF PROOF

The defendant, Elaine Brown, hereby moves this Honorable Court to unseal the Ex Parte Offer of Proof filed by trial counsel for Mrs. Brown on or about June 23 or 24, 2009. Grounds follow

1. The defendant may seek to include the Ex Parte Offer of Proof in the Record Appendix to be filed with her Brief at the Court of Appeals.
2. The defendant has personally authorized the filing of this motion, understanding that it will cause the Ex Parte Offer of Proof to be unsealed and therefore accessible to others.
3. The government does not oppose the relief sought herein.
4. No memorandum accompanies this motion because it is unopposed.

WHEREFORE, it is respectfully moved that the Court grant said relief and such other and further relief as may be just.

Respectfully submitted,
ELAINE BROWN
By Her Attorney,

Date: January 5, 2011

/s/ Bjorn Lange

Bjorn Lange (NHBA: 1426)
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CERTIFICATE OF SERVICE

I Bjorn Lange hereby certify that on January 5, 2011, a copy of the foregoing was sent via ECF to all counsel of record and that a copy will be sent via electronic mail to Attorney Leslie Feldman, appellate counsel for Elaine Brown.

/s/ Bjorn Lange